

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CAROL S. MARCELLIN, individually, and as Co-Administrator of the Estate of Charles E. Hollowell, deceased, and JESSICA HOLLOWELL-McKAY, as Co-Administrator of the Estate of Charles E. Hollowell, deceased,

Plaintiffs,

v.

HP, INC., and STAPLES, INC.,

Defendants.

Civ. No. 1:21-cv-00704-JLS

**DEFENDANT HP INC.'S SUPPLEMENTAL ANSWERS TO PLAINTIFFS'
SECOND SET OF INTERROGATORIES**

HP Inc. hereby makes these answers to plaintiffs' second set of interrogatories:

1. Identify the date the **Laptop** was first sold, the amount received by HP in the sale, the suggested retail (sic) price of the **Laptop** and the name and address of the purchaser, wholesaler or retailer.

ANSWER #1:

After diligent search, HP Inc. states it is not able to answer this interrogatory as to the specific notebook at issue. Further answering, HP states that based upon the information available to it in 2023 that the notebook model at issue had a suggested retail price of approximately \$600 when originally brought to market.

SUPPLEMENTAL ANSWER #1:

Further answering, HP states it has undertaken search of additional offline archival data sources of the serial number for the notebook at issue. Based on that search HP has ascertained that the notebook at issue was sold by HP, Inc. to Staples, Inc. on or about February 7, 2011 and delivered to Staples, Inc.'s Distribution Center in Hagerstown, Maryland, located at 11540 Hopewell Rd., on or about February 21, 2011. *See* HP 01418-01427 produced herewith comprising the original sales and shipment information concerning the subject notebook bearing product serial number CNF0520NDJ.

2. Identify the name and address of the person or entity who registered for the warranty described in HP 00482 for the **Laptop**.

ANSWER #2:

Carol Marcellin; 192 Bells Brook Road, Ceres, NY 14721
Email address: Carolina1095@STNY.RR.COM

SUPPLEMENTAL ANSWER #2:

Further answering, HP states that it has undertaken to review additional information concerning the plaintiff Carol Marcellin's product registration flow in its customer relationship management solution system. Based on the information that was able to be located, the plaintiff's customer registration information for the notebook at issue was manually input by her (or on her behalf) and submitted to HP on March 5, 2011. *See* HP 01428-01438 produced herewith comprising the customer registration information for the subject notebook bearing product serial number CNF0520NDJ. On that date, the plaintiff's additional email address "camarshmallow@hotmail.com" was submitted to HP. *See* HP01432. The "created by" entry of "311" corresponds with the customer registration application and establishes that registration information was received by HP from the customer registration application after being manually input and submitted by the customer Carol Marcellin (or on her behalf) on March 5, 2011.

The undersigned deposes and states under penalties of perjury, on the 10 of January 2024, that I am the Manager, Global Claims & Insurance with HP Inc., defendant in the above-captioned action. I have read the foregoing supplemental answers to interrogatories and know the contents thereof; these answers were prepared with the assistance of counsel upon whose advice I have relied; that the answers set forth herein, subject to inadvertent or undiscoverable errors, are not all within my personal knowledge and there is no employee of HP Inc. who has knowledge of all such matters; that the answers herein are based on and are, therefore, necessarily limited by records in and information still in existence, presently recollected and thus far discovered in the course of preparation of these answers; that HP reserves the right to supplement or make any changes in the answers if it appears at any time that omissions or errors have been made or that more accurate information is available; that subject to the limitations set forth herein these answers are true to the best of my knowledge, information and belief.

HP Inc.,

BY: Monica Olis

Monica Olis

Its: Manager – Global Claims & Insurance

As to objections:

HP INC.,

By its attorneys,

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Certificate of Service

I, Jacklyn S. Wanemaker, do hereby certify that on the _____ day of January 2024, , I served a copy of the within document via email to:

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